

EXHIBIT 2

From: Noonan, Jeanne E. <jnoonan@mcguirewoods.com>
Sent: Wednesday, November 27, 2019 3:56 PM
To: David Hartnett; Monica McCarroll; James Chapman; W. Ryan Snow; Darius Davenport; Hugh Fain; Connell Mullins; Spivey, W. Edgar; John Erbach; Belote, Clark J.; Peterson, Ashley P.; McFarland, Robert W.; Evans, Jason D.; Hatch, Benjamin L.; Kynes, Cameron G.; Justus, J. Brent
Cc: Wingfield, Alan D.; Lacy, Michael E.; Flowers, Elizabeth Spain; Stephanie Hunter
Subject: RE: CSXT v. NSR et al. - CSXT Search Terms
Attachments: Active_124295479_1_CSXT - Initial Search Terms - 11.27.19.PDF

Counsel,

Attached please find CSXT's initial set of search terms.
I hope you all have a very Happy Thanksgiving!

Thank you,
Jeanne

Jeanne E. Noonan

McGuireWoods LLP
T: +1 757 640 3719 | M: +1 757 289 6526

From: Noonan, Jeanne E.
Sent: Tuesday, November 26, 2019 6:35 PM
To: David Hartnett <dhartnett@cwm-law.com>; Monica McCarroll <MMcCarroll@redgravellp.com>; James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Darius Davenport <ddavenport@cwm-law.com>; Hugh Fain <hfain@spottsfain.com>; Connell Mullins <cmullins@spottsfain.com>; Spivey, W. Edgar <wespivey@kaufcan.com>; John Erbach <jerbach@spottsfain.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Peterson, Ashley P. <APeterson@mcguirewoods.com>; McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Evans, Jason D. <JEvans@mcguirewoods.com>; Hatch, Benjamin L. <BHatch@mcguirewoods.com>; Kynes, Cameron G. <CKynes@mcguirewoods.com>; Justus, J. Brent <bjustus@mcguirewoods.com>
Cc: Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; liz.flowers@troutmansanders.com; Stephanie Hunter <shunter@cwm-law.com>
Subject: RE: CSXT v. NSR et al. - NSR Search Terms

Counsel,

Thank you for your emails. Pursuant to our discussions during last week's meet and confer, CSXT is still in the process of finalizing its search terms. With the holiday rapidly approaching, we will follow up with you all soon, and no later than early next week.

Thank you,
Jeanne

Jeanne E. Noonan

Associate
McGuireWoods LLP

World Trade Center
101 West Main Street
Suite 9000
Norfolk, VA 23510-1655
T: +1 757 640 3719
M: +1 757 289 6526
F: +1 757 640 3949
jnoonan@mcguirewoods.com
Bio | VCard | www.mcguirewoods.com



From: David Hartnett <dhartnett@cwm-law.com>
Sent: Tuesday, November 26, 2019 4:42 PM
To: Monica McCarroll <MMcCarroll@redgravellp.com>; James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Darius Davenport <ddavenport@cwm-law.com>; Hugh Fain <hfain@spottsfain.com>; Connell Mullins <cmullins@spottsfain.com>; Spivey, W. Edgar <wespivey@kaufcan.com>; John Erbach <jerbach@spottsfain.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Peterson, Ashley P. <APeterson@mcguirewoods.com>; Noonan, Jeanne E. <jnoonan@mcguirewoods.com>; McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Evans, Jason D. <JEvans@mcguirewoods.com>; Hatch, Benjamin L. <BHatch@mcguirewoods.com>; Kynes, Cameron G. <CKynes@mcguirewoods.com>; Justus, J. Brent <bjustus@mcguirewoods.com>
Cc: Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; liz.flowers@troutmansanders.com; Stephanie Hunter <shunter@cwm-law.com>
Subject: RE: CSXT v. NSR et al. - NSR Search Terms [IWOV-Active.FID39729]

****EXTERNAL EMAIL; use caution with links and attachments****

Thanks Monica.

Likewise, attached are NPBL's proposed search terms.

David

From: Monica McCarroll <MMcCarroll@redgravellp.com>
Sent: Tuesday, November 26, 2019 3:29 PM
To: James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Darius Davenport <ddavenport@cwm-law.com>; Hugh Fain <hfain@spottsfain.com>; Connell Mullins <cmullins@spottsfain.com>; Spivey, W. Edgar <wespivey@kaufcan.com>; John Erbach <jerbach@spottsfain.com>; Belote, Clark J. <cjbelote@kaufcan.com>; Peterson, Ashley P. <APeterson@mcguirewoods.com>; Noonan, Jeanne E. <jnoonan@mcguirewoods.com>; McFarland, Robert W. <rmcfarland@mcguirewoods.com>; Evans, Jason D. <JEvans@mcguirewoods.com>; Hatch, Benjamin L. <BHatch@mcguirewoods.com>; Kynes, Cameron G. <CKynes@mcguirewoods.com>; Justus, J. Brent <bjustus@mcguirewoods.com>; David Hartnett <dhartnett@cwm-law.com>
Cc: Wingfield, Alan D. <Alan.Wingfield@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; liz.flowers@troutmansanders.com
Subject: CSXT v. NSR et al. - NSR Search Terms [IWOV-Active.FID39729]

Counsel,

Per our discussion during the meet and confer last Wednesday, I am attaching NSR's first set of search terms. Please note that these initial terms are targeted at only some of the discovery requests issued by CSXT to date. NSR continues to refine additional terms targeted at other discovery requests issued by CSXT, and will share those additional search terms when they are ready. Please advise if you have any comments or concerns about NSR's first set of search terms, or would like to schedule a meet and confer to discuss further.

Regards,

MONICA McCARROLL

OF COUNSEL | **REDGRAVE LLP** | (O) 703.592.1155 | (M) 571.377.9960

mmccarroll@redgravellp.com

CONFIDENTIALITY STATEMENT: This email message and any attachments are confidential and may be subject to the attorney-client or other applicable privileges. If you are not the intended recipient, please immediately reply to the sender and delete the message and any attachments. Thank you.

This e-mail from McGuireWoods may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

CSX TRANSPORTATION, INC.,
individually and on behalf of NORFOLK
& PORTSMOUTH BELT LINE
RAILROAD COMPANY,

Plaintiff,

v.

Civil Action No. 2:18cv530

NORFOLK SOUTHERN RAILWAY
COMPANY, NORFOLK & PORTSMOUTH
BELT LINE RAILROAD COMPANY,
JERRY HALL, THOMAS HURLBUT,
PHILIP MERILLI, and CANNON MOSS,

Defendants.

**PLAINTIFF CSX TRANSPORTATION, INC.'S
INITIAL SEARCH TERMS**

Search Term List:
NPBL*
Belt line*
Beltline*
Dray* AND (analy* or project* or estimat* or rat* or stud*)
Dray* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"trucking services" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Volume* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Capacit* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"switch rate*" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"switch service*" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"Norfolk Southern" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
NS* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"vertical clearance" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"double stack" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"on dock rail" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"near dock rail" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Track* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)

(Intermodal OR “Inter modal”) AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Terminal* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Port* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Freight* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“service proposal” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“rate proposal” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Maersk AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“CMA CGM” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
(MSC OR “Mediterranean Shipping Company” OR “Med Shipping” OR “Mediterranean Shipping Co”) AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Hapag Lloyd” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Ocean Express” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Evergreen AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Yang Ming” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Hyundai AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Zim AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“China Shipping” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Cosco AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Hanjin AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Diamond*
“Pinner’s Point”
“Portlock Yard”
“Carolina Juncture”
“NS Juncture”
“N&W” AND “Southern Railway”
“interline switch settlement”
“Commonwealth Railway”
“Commonwealth Rail”
“2010 Proposal”
“2018 Proposal”
Heartland
Jerry AND Hall
Hurlbut
Cannon AND Moss
Merilli
“1897 Operating Agreement”
Market* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Compet* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Tariff*
“spot market”
Perdue
“short line” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)